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*Attorney for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

VALERIE HIRATA; WHITNIE TAYLOR; and  
ANGELA JONES

CASE NO.: 2:13-cv-02302-LDG-VCF

Plaintiffs,

v.

SOUTHERN NEVADA HEALTH DISTRICT, a  
political subdivision of Clark County, Nevada;  
GLENN SAVAGE, in both his individual and  
official capacity; AMY IRANI, in both her  
individual and official capacity; SUSAN LABAY,  
in both her individual and official capacity;  
JACQUELYN RAICHE-CURL, in both her  
individual and official capacity; ANGUS  
MACEACHERN, in both his individual and  
official capacity; ROBERT GUNNOE, in both his  
individual and official capacity; KIM  
DIPASQUALE, in both her individual and official  
capacity; LAWRENCE SANDS, in both his  
individual and official capacity;

Defendants.

**STIPULATION AND ORDER TO**  
**EXTEND TIME TO COMPLETE**  
**DISCOVERY PURSUANT TO LR 26-4**  
**(FIFTH REQUEST)**

Pursuant to LR 26-4, the parties, by and through their respective counsel of record, for good  
cause, and hereby stipulate to extend the discovery deadlines in the above-entitled matter by one  
hundred fifty (150) days up to including March 3, 2016. The parties state the following:

1. **Statement specifying discovery completed:**

<b><u>DOCUMENT</u></b>	<b><u>DATE</u></b>	<b><u>PARTY</u></b>
Notice of LR 26-1 Conference	02/26/14	PSL
Plaintiffs' Initial Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	02/28/14	PSL
Plaintiffs' First Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/07/14	PSL
Plaintiffs' Second Supplement to re-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/14/14	PSL
Defendants' Fed. R. Civ. P. 26(f) Production	03/14/14	Olson/Cannon
Plaintiffs' Third Supplement to re-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/21/14	PSL
Plaintiffs' Fourth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/25/14	PSL
Plaintiffs' Fifth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/28/14	PSL
Plaintiffs' Sixth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/04/14	PSL
Plaintiffs' First Set of Request for Production of Documents to Defendant Southern Nevada Health District	04/04/14	PSL
Plaintiffs' First Set of Request for Production of Documents to Defendants angus MacEachern, Lawrence Sands, Kim DiPasquale and Robert Gunnoe	04/08/14	PSL
Plaintiffs' First Set of Request for Production of Documents to Defendants Glenn Savage, Rose Henderson, Amy Irani, Susan LaBay, Jacque Raiche-Curl, Lorraine Forston, Robert Newton and Cara Evangelista	04/08/14	PSL
Defendants Southern Nevada Health District, Angus MacEachern, Lawrence Sands, Kim DiPasquale, and Robert Gunnoe's Initial Disclosures	04/10/14	Fisher/Phillips



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1	Plaintiffs' Seventh Supplement to Pre-Trial Disclosures	04/11/14	PSL
2	Made Pursuant to LR 26-1 and FRCP 26(a)(1)		
3	Plaintiffs' Eighth Supplement to Pre-Trial Disclosures	04/18/14	PSL
4	Made Pursuant to LR 26-1 and FRCP 26(a)(1)		
5	Plaintiffs' Ninth Supplement to Pre-Trial Disclosures	04/18/14	PSL
6	Made Pursuant to LR 26-1 and FRCP 26(a)(1)		
7	Certificate of Service	05/01/14	PSL
8	Plaintiffs' Tenth Supplement to Pre-Trial Disclosures	05/05/14	PSL
9	Made Pursuant to LR 26-1 and FRCP 26(a)(1)		
10	Defendants' Responses to First Set of Request for	05/12/14	Olson/Cannon
11	Production of Documents to defendants Glenn Savage,		
12	Rose Henderson, Amy Irani, Susan LaBay, Jacque		
13	Raiche-Curl, Lorrain Forston, Robert Newton, an Cara		
14	Evangelista		
15	Plaintiffs' Notice of Issuance of Subpoena for	05/15/14	PSL
16	Production of Documents		
17	Plaintiff's Eleventh Supplement to Pre-Trial Disclosures	05/16/14	PSL
18	Made Pursuant to LR 26-1 and FRCP 26(a)(1)		
19	Affidavit of Service	05/22/14	PSL
20	Defendant Southern Nevada Health District's Responses	05/27/14	Fisher/Phillips
21	to Plaintiffs' First Set of Request for Production of		
22	Documents		
23	Defendants Angus MacEachern, Lawrence Sands, Kim	05/27/14	Fisher/Phillips
24	DiPasquale, and Robert Gunnoe's Responses to		
25	Plaintiffs' First Set of Request for Production of		
26	Documents		
27	Defendant Angus MacEachern's First Set of	05/30/14	Fisher/Phillips
28	Interrogatories to Plaintiff Valerie Hirata		
	Defendant Southern Nevada Health District's First Set	05/30/14	Fisher/Phillips
	of Interrogatories to Plaintiff Valerie Hirata		
	Defendant Robert Gunnoe's First Set of Interrogatories	05/30/14	Fisher/Phillips
	to Plaintiff Angela Jones		

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Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Whitney Taylor	05/30/14	Fisher/Phillips
Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Whitney Taylor	05/30/14	Fisher/Phillips
Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Whitney Taylor	05/30/14	Fisher/Phillips
Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Whitney Taylor	05/30/14	Fisher/Phillips
Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Whitney Taylor	05/30/14	Fisher/Phillips
Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Fisher/Phillips
Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Fisher/Phillips
Plaintiffs' Twelfth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	06/09/14	PSL
Plaintiffs' Notice of Taking Videotaped Depositions (All Defendants)	06/18/14	PSL
Defendants' Responses to First Set of Request for Production of Documents to Defendants Glenn Savage, Rose Henderson, Amy Irani, Susan LaBay, Jacque Raiche-Curl, Lorraine Forston, Robert Newton and Cara Evangelista (First Supplement)	06/23/14	Olson/Cannon



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1	Plaintiffs' Responses to Southern Nevada Health	07/07/14	PSL
2	District's Request for Production of Documents		
3	Plaintiffs' Thirteenth Supplement to Pre-Trial	07/22/14	PSL
4	Disclosures Made Pursuant to LR 26-1 and FRCP		
5	26(a)(1)		
6	Plaintiffs' Fourteenth Supplement to Pre-Trial	07/30/14	PSL
7	Disclosures Made Pursuant to LR 26-1 and FRCP		
8	26(a)(1)		
9	Plaintiff Valerie Hirata's Answers to Defendant	07/30/14	PSL
10	Southern Nevada Health District's First Set of		
11	Interrogatories		
12	Plaintiff Valerie Hirata's Answers to Defendant	07/30/14	PSL
13	Lawrence Sands' First Set of Interrogatories		
14	Plaintiff Valerie Hirata's Answers to Defendant Angus	07/30/14	PSL
15	MacEachern's First Set of Interrogatories		
16	Plaintiff Valerie Hirata's Answers to Defendant Robert	07/30/14	PSL
17	Gunnore's First Set of Interrogatories		
18	Plaintiff Valerie Hirata's Answers to Defendant Kim	07/30/14	PSL
19	DiPasquale's First Set of Interrogatories		
20	Plaintiff Angela Jones' Answers to Defendant Southern	07/30/14	PSL
21	Nevada Health District's First Set of Interrogatories		
22	Plaintiff Angela Jones' Answers to Defendant Lawrence	07/30/14	PSL
23	Sands' First Set of Interrogatories		
24	Plaintiff Angela Jones' Answers to Defendant Angus	07/30/14	PSL
25	MacEachern's First Set of Interrogatories		
26	Plaintiff Angela Jones' Answers to Defendant Robert	07/30/14	PSL
27	Gunnore's First Set of Interrogatories		
28	Plaintiff Angela Jones' Answers to Defendant Kim	07/30/14	PSL
	DiPasquale's First Set of Interrogatories		
	Plaintiff Whitnie Taylor's Answers to Defendant	07/30/14	PSL
	Southern Nevada Health District's First Set of		
	Interrogatories		
	Plaintiff Whitnie Taylor's Answers to Defendant	07/30/14	PSL
	Lawrence Sands' First Set of Interrogatories		

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1	Plaintiff Whitnie Taylor's Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
2			
3	Plaintiff Whitnie Taylor's Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL
4			
5	Plaintiff Whitnie Taylor's Answers to Defendant Kim DiPasquale's First Set of Interrogatories	07/30/14	PSL
6			
7	Defendant Southern Nevada Health District's Second Set of Interrogatories to Plaintiffs	08/06/14	Fisher/Phillips
8			
9	Defendant Southern Nevada Health District's Second Requests for Production of Documents to Plaintiffs	08/06/14	Fisher/Phillips
10			
11	Plaintiffs' Fifteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	09/03/14	PSL
12			
13	Defendants': G. Savage, R. Henderson, A. Irani, S. LaBay, J. Raiche-Curl, L. Forston R. Newton and C. Evangelista Initial Disclosures (Second Supplement)	09/09/14	Olson/Cannon
14			
15	Plaintiffs' Sixteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	09/09/14	PSL
16			
17	Deposition of Lorraine Forston, Vol 1	09/10/14	PSL
18			
19	Plaintiffs' Answers to Southern Nevada Health District's Second Set of Interrogatories	09/15/14	PSL
20			
21	Plaintiffs' Responses to Southern Nevada Health District's Second Request for Production of Documents	09/15/14	PSL
22			
23	Plaintiffs' Seventeenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	09/15/14	PSL
24			
25	Plaintiffs' First Supplemental Responses to Southern Nevada Health District's First Request for Production of Documents	09/15/14	PSL
26			
27	Defendants': G. Savage, R. Henderson, A. Irani, S. LaBay, J. Raiche-Curl, L. Forston R. Newton and C. Evangelista Initial Disclosures (Third Supplement)	09/18/14	Olson/Cannon
28			
	Deposition of Robert Gunnoe	09/19/14	PSL



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1	First Supplement to Defendants Southern Nevada Health	09/23/14	Fisher/Phillips
2	Districts, Angus MacEachern, Lawrence Sands, Kim		
3	DiPasquale, and Robert Gunnoe's Initial Disclosures		
4	Plaintiffs' Third Set of Request for Production of	10/07/14	PSL
5	Documents to Defendant Southern Nevada Health		
6	District		
7	Plaintiffs' Eighteenth Supplement to Pre-Trial	10/17/14	PSL
8	Disclosures Made Pursuant to LR 26-1 and FRCP		
9	26(a)(1)		
10	Deposition of Lawrence Sands	10/20/14	PSL
11	Deposition of Robert Newton	10/22/14	PSL
12	Deposition of Lorraine Forston, Vol II	10/23/14	PSL
13	Defendants': G. Savage, R. Henderson, A. Irani, S.	11/10/14	Olson/Cannon
14	LaBay, J. Raiche-Curl, L. Forston R. Newton and C.		
15	Evangelista Initial Disclosures (Fourth Supplement)		
16	Plaintiffs' Nineteenth Supplement to Pre-Trial	11/12/14	PSL
17	Disclosures Made Pursuant to LR 26-1 and FRCP		
18	26(a)(1)		
19	Deposition of Rose Henderson	11/13/14	PSL
20	Deposition of Susan Leaverton	11/19/14	PSL
21	Deposition of Amy Irani	11/20/14	PSL
22	Plaintiffs' First Set of Interrogatories to Defendant	12/12/14	PSL
23	Southern Nevada Health District		
24	Defendant Southern Nevada Health District's Third	12/24/14	Fisher/Phillips
25	Request for Production of Documents to Plaintiffs		
26	Defendant Southern Nevada Health District's Third Set	12/24/14	Fisher/Phillips
27	of Interrogatories to Plaintiff Valerie Hirata		
28	Defendant Southern Nevada Health District's Third Set	12/24/14	Fisher/Phillips
	of Interrogatories to Plaintiff Angela Jones		
	Defendant Southern Nevada Health District's Third Set	12/24/14	Fisher/Phillips
	of Interrogatories to Plaintiff Whitnie Taylor		

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1	Plaintiffs' Twentieth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	01/06/15	PSL
2			
3	Deposition of Jacque Raiche-Curl	01/07/15	PSL
4			
5	Plaintiffs' Twenty-first Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	01/26/15	PSL
6			
7	Plaintiff Whitnie Taylor's Answers to Defendant Southern Nevada Health District's Third Set of Interrogatories	01/21/15	PSL
8			
9	Plaintiff Angela Jones' Answers to Defendant Southern Nevada Health District's Third Set of Interrogatories	01/21/15	PSL
10			
11	Defendant Southern Nevada Health District's Answers to Plaintiffs' First Set of Interrogatories	01/22/15	Fisher/Phillips
12			
13	Plaintiff Valerie Hirata's Answers to Defendant Southern Nevada Health District's Third Set of Interrogatories	01/25/15	PSL
14			
15	Plaintiffs' Responses to Defendant Southern Nevada Health District's Third Request for Production of Documents to Plaintiffs	01/26/15	PSL
16			
17	Glenn Savage's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
18			
19	Glenn Savage's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
20			
21	Defendants' Request for Production of Documents to Valerie Hirata	03/03/15	Olson/Cannon
22			
23	Amy Irani's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
24			
25	Amy Irani's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
26			
27	Susan LaBay's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
28			
	Susan LaBay's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
	Jacquelyn Raiche-Curl's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon



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Jacquelyn Raiche-Curl's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
Glenn Savage's Request for Admissions to Whitney Taylor	03/03/15	Olson/Cannon
Glenn Savage's Interrogatories to Whitney Taylor	03/03/15	Olson/Cannon
Defendants' Request for Production of Documents to Whitney Taylor	03/03/15	Olson/Cannon
Amy Irani's Request for Admissions to Whitney Taylor	03/03/15	Olson/Cannon
Amy Irani's Interrogatories to Whitney Taylor	03/03/15	Olson/Cannon
Susan LaBay's Request for Admissions to Whitney Taylor	03/03/15	Olson/Cannon
Susan LaBay's Interrogatories to Whitney Taylor	03/03/15	Olson/Cannon
Jacquelyn Raiche-Curl's Request for Admissions to Whitney Taylor	03/03/15	Olson/Cannon
Jacquelyn Raiche-Curl's Interrogatories to Whitney Taylor	03/03/15	Olson/Cannon
Glenn Savage's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
Glenn Savage's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
Defendants' Request for Production of Documents to Angela Jones	03/03/15	Olson/Cannon
Amy Irani's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
Amy Irani's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
Susan LaBay's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
Susan LaBay's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
Jacquelyn Raiche-Curl's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
Jacquelyn Raiche-Curl's Interrogatories to Angela Jones	03/03/15	Olson/Cannon

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1	Plaintiffs' Twenty-second Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/11/15	PSL
2			
3	Deposition of Steven Goode, Vol 1	03/12/15	Fisher/Phillips
4			
5	Deposition of Steven Goode, Vol 2	03/15/15	PSL
6	Plaintiffs' Notice of Vacating the Deposition of Tim Pangborn	03/17/15	PSL
7			
8	Notice of Deposition – All Plaintiffs	04/03/15	Fisher/Phillips
9	Plaintiffs' Eleventh Amended Notice of Videotaped Deposition – Steven Goode	04/07/15	PSL
10	Notice of Deposition of Steve Goode	04/07/15	Fisher/Phillips
11			
12	Defendant Southern Nevada Health District's Fourth Set of Interrogatories to Plaintiff Whitney Taylor	04/09/15	Fisher/Phillips
13	Defendant Southern Nevada Health District's Fourth Set of Interrogatories to Plaintiff Valerie Hirata	04/09/15	Fisher/Phillips
14			
15	Defendant Southern Nevada Health District's Fourth Set of Interrogatories to Plaintiff Angela Jones	04/09/15	Fisher/Phillips
16			
17	Defendant Southern Nevada Health District's Fourth Request for Production of Documents to Plaintiffs' (NOS. 23-26)	04/09/15	Fisher/Phillips
18			
19	Deposition of Steven Goode, Vol 3	04/20/15	PSL
20	Plaintiffs' Twenty-Third Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/20/15	PSL
21			
22	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action – MGM Grand Hotel LLC	04/22/15	PSL
23			
24	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action – Crescent Hotels & Resorts	04/22/15	PSL
25			
26			
27			
28			



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1	Subpoena to Produce Documents, Information, or	4/22/15	PSL
2	Objects or to Permit Inspection of Premises in a Civil		
3	Action– HRHH Hotel/Casino		
4	Plaintiffs’ Notice of Taking Depositions (Custodian of	04/22/15	PSL
5	Records)		
6	Notice of Deposition of Valerie Hirata	04/23/15	Fisher/Phillips
7	Notice of Deposition of Angela Jones	04/23/15	Fisher/Phillips
8	Notice of Deposition of Whitnie Taylor	04/23/15	Fisher/Phillips
9	Affidavit of Service – to HRHH Hotel/Casino	04/24/15	PSL
10	Affidavit of Service – to MGM Grand Hotel	04/24/15	PSL
11	Plaintiffs’ Twenty-Fourth Supplement to Pre-Trial	04/26/15	PSL
12	Disclosures Made Pursuant to LR 26-1 and FRCP		
13	26(a)(1)		
14	Proof of Service – Crescent Hotels & Resorts, LLC	04/30/15	PSL
15	Notice of Vacating Depositions	05/04/15	Fisher/Phillips
16	Amended Notice of Deposition of Whitnie Taylor	05/05/15	Fisher/Phillips
17	Amended Notice of Deposition of Angela Jones	05/05/15	Fisher/Phillips
18	Amended Notice of Deposition of Valerie Hirata	05/05/15	Fisher/Phillips
19	Plaintiffs’ Twelfth Amended Notice of Videotaped	05/13/15	PSL
20	Depositions		
21	Subpoena to Produce Documents, Information, or	05/15/15	PSL
22	Objects or to Permit Inspection of Premises in a Civil		
23	Action		
24	Plaintiff’s Notice of Taking the Deposition of the	05/15/15	PSL
25	Custodian of Records of Clark County Fire Dept.		
26	Affidavit of Service - COR for Clark County Fire Dept.	5/19/15	PSL
27	Plaintiffs’ Notice of Taking the Deposition of the	05/20/15	PSL
28	Custodian of Records of Clark County Fire Department		

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Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a civil Action	05/20/15	PSL
Plaintiffs' Thirteenth Amended Notice of Videotaped Depositions	05/20/15	PSL
Valerie Hirata's Responses to Amy Irani's Request for Admissions	05/20/15	PSL
Whitnie Taylor's Responses to Amy Irani's Request for Admissions	05/20/15	PSL
Angela Jones' Responses to Amy Irani's Request for Admissions	05/20/15	PSL
Valerie Hirata's Responses to Jacquelyn Raiche-Curl's Request for Admissions	05/20/15	PSL
Whitnie Taylor's Responses to Jacquelyn Raiche-Curl's Request for Admissions	05/20/15	PSL
Angela Jones' Responses to Jacquelyn Raiche-Curl's Request for Admissions	05/20/15	PSL
Valerie Hirata's Responses to Susan Labay's Request for Admissions	05/20/15	PSL
Whitnie Taylor's Responses to Susan Labay's Request for Admissions	05/20/15	PSL
Angela Jones' Responses to Susan Labay's Request for Admissions	05/20/15	PSL
Valerie Hirata's Responses to Glenn Savage's Request For Admissions	05/20/15	PSL
Whitnie Taylor's Responses to Glenn Savage's Request for Admissions	05/20/15	PSL
Angela Jones' Responses to Glenn Savage's Request for Admissions	05/20/15	PSL
Plaintiff Valerie Hirata's Answers to Defendant Jacquelyn Raiche-Curl's Interrogatories	05/20/15	PSL
Plaintiff Valerie Hirata's Answers to Defendant Susan Labay's Interrogatories	05/20/15	PSL



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1	Plaintiffs Valerie Hirata's Answers to Defendant Amy Irani's Interrogatories	05/20/15	PSL
2			
3	Plaintiff Valerie Hirata's Answers to Defendant Glenn Savage's Interrogatories	05/20/15	PSL
4			
5	Plaintiff Angela Jones' Answers to Defendant Susan Labay's Interrogatories	05/20/15	PSL
6			
7	Plaintiff Angela Jones' Answers to Defendant Jacquelyn Raiche-Curl's Interrogatories	05/20/15	PSL
8			
9	Plaintiff Angela Jones' Answers to Defendant Amy Irani's Interrogatories	05/20/15	PSL
10			
11	Plaintiff Angela Jones' Answers to Defendant Glenn Savage's Interrogatories	05/20/15	PSL
12			
13	Plaintiffs Whitnie Taylor's Answers to Defendant Susan Labay's Interrogatories	05/20/15	PSL
14			
15	Plaintiffs Whitnie Taylor's Answers to Defendant Glenn Savage's Interrogatories	05/20/15	PSL
16			
17	Plaintiff Whitnie Taylor's Answers to Defendant Amy Irani's First Set of Interrogatories	05/20/15	PSL
18			
19	Plaintiff Whitnie Taylor's Answers to Defendant Jacquelyn Raiche-Curl's Interrogatories	05/20/15	PSL
20			
21	Whitnie Taylor's Responses to Defendant's Request for Production of Documents	05/20/15	PSL
22			
23	Valerie Hirata's Responses to Defendants' Request for Production of Documents	05/20/15	PSL
24			
25	Angela Jones' Responses to Defendants' Request for Production of Documents	05/20/15	PSL
26			
27	Plaintiffs Twenty-Fifth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	05/20/15	PSL
28			
	Defendant Southern Nevada Health District's Supplemental Responses to Plaintiffs' Third Set of Request for Production of Documents	05/22/15	Fisher/Phillips

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Defendant Southern Nevada Health District's Supplemental Responses to Plaintiff's First Set of Request for Production of Documents	05/22/15	Fisher/Phillips
Affidavit of Service – COR for Clark County Fire Department	05/27/15	PSL
Plaintiffs Twenty-Sixth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	06/01/15	PSL
Deposition of Defendant Angus MacEachern	06/08/15	PSL
Plaintiff Valerie Hirata's Answers to Defendant Southern Nevada Health District's Fourth Set of Interrogatories	06/08/15	PSL
Plaintiff Angela Jones's Answers to Defendant Southern Nevada Health District's Fourth Set of Interrogatories	06/08/15	PSL
Plaintiff Whitney Taylor's Answers to Defendant Southern Nevada Health District's Fourth Set of Interrogatories	06/08/15	PSL
Plaintiff's Responses to Defendant Southern Nevada Health District's Fourth Set of Request for Production of Documents (NOS. 23-26)	06/08/15	PSL
Plaintiffs' Notice of Objection to (1) Amended Notice of Deposition of Valerie Hirata; (2) Amended Notice of Deposition of Angela Jones and (3) Amended Notice of Deposition of Whitney Taylor	06/08/15	PSL
Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action-Depo International, LLC	06/11/15	PSL
Plaintiff Notice of Taking the Deposition of the Custodian of Records of Depo International, LLC	06/12/15	PSL
Deposition of Plaintiff Angela Jones, Vol 1	06/15/15	Fisher/Phillips
Deposition of Plaintiff Angela Jones, Vol 2	06/16/15	Fisher/Phillips
Deposition of Plaintiff Valerie Hirata, Vol 1	06/17/15	Fisher/Phillips



Deposition of Plaintiff Valerie Hirata, Vol 2	06/18/15	Fisher/Phillips
Deposition of Plaintiff Whitnie Taylor	06/19/15	Fisher/Phillips
Affidavit of Service – Depo International, LLC	6/30/15	PSL
Defendants’ Fed. R. Civ. P. 26(f) Production Sixth Supplement	07/14/15	Olson/Cannon
Plaintiffs’ Notice of Vacating the Videotaped Deposition of Cara Evangelista	07/16/15	PSL
Plaintiffs’ Twenty-Seventh Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	07/22/15	PSL
Deposition of Glenn Savage, Vol. 1	07/23/15	PSL

**2. Specific description of discovery that needs to be completed:**

Plaintiffs and Defendants will retain and disclose expert witnesses, rebuttal expert disclosures, possible continued depositions of all Plaintiffs in addition to the depositions of Defendants Glenn Savage (Vol. 2) and Kim DiPasquale. Additional depositions of the person(s) most knowledgeable for Defendants, depositions of any percipient witnesses and lay witnesses; and additional Interrogatories, Requests for Admission and Requests for Production to Plaintiffs and Defendants (if necessary).

**3. The reasons why the deadline was not satisfied:**

The plaintiffs’ worked for the Southern Nevada Health District for approximately ten (10) years each. As such, the instant lawsuit alleges causes of actions pertaining to the history of the plaintiffs’ employment that requires extensive investigation by all parties.

Due to the large number of depositions that must occur in this case and handling scheduling conflicts among the parties and their counsel, not all depositions will be able to be scheduled within sufficient time before the current close of discovery deadline. In addition to the remaining

defendants to be deposed (Glenn Savage, Vol. 2 and Kim DiPasquale), the plaintiffs anticipate taking the depositions of approximately ten (10) additional third-party witnesses.

It will be beneficial to have completed the remaining depositions prior to the initial expert disclosure in order for the experts to have all necessary information prior to the time of the initial disclosure deadline.

Finally, as of Plaintiffs' 28<sup>th</sup> supplement to their initial disclosures, they have identified several hundred witnesses and have produced approximately 25,000 pages of documents. Completing depositions of the parties will be important to further narrow down those witnesses and documents.

**4. Proposed schedule for completing discovery:**

<b><u>Scheduled Event</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed Deadline</u></b>
Discovery Deadline	October 5, 2015	Thursday, March 3, 2016
Amend Pleadings/Add Parties	August 3, 2015	Monday, December 5, 2016
Initial Expert Disclosure Deadline	August 3, 2015	Monday, December 5, 2016
Rebuttal Expert Deadline	September 4, 2015	Tuesday, February 2, 2016
Interim Status Report	August 3, 2015	Monday, December 5, 2016
Dispositive Motion Deadline	November 2, 2015	Monday, April 4, 2016
Pre-Trial Order (unless dispositive motions are filed, in which case the deadline shall be 30 days after decision of the dispositive motions or further order of the Court)	December 1, 2015	Wednesday, May 4, 2016
Last Day to Submit Motion and/or Stipulation to Extend Discovery	September 11, 2015	Friday, February 12, 2016

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DATED this 31<sup>st</sup> day of July, 2015.

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DATED this 31<sup>st</sup> day of July, 2015.

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DATED this 31<sup>st</sup> day of July, 2015.

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**ORDER**

IT IS SO ORDERED.

DATED this 31<sup>st</sup> day of July, 2015.



UNITED STATES MAGISTRATE JUDGE